

EXHIBIT M

From: Seth Andrews <sandrews@kennethhiller.com>
Sent: Thursday, October 06, 2016 5:36 PM
To: Paul A. Woodard
Subject: RE: Wagner v. Chiari & Ilecki

Paul,

Per our conversation of today, Plaintiff will agree to produce the two notices from the United States Postal Service regarding the attempted delivery of certified mail addressed to William J. Wagner, Jr., at 5419 Roberts Road, Hamburg, New York 14075, in or around February and March 2015. I anticipate providing you with those by next week. The notes that Mr. Wagner testified to taking regarding his elevated blood pressure are no longer in his possession. He indicated to me that he looked for them but believes he discarded them as it was not his usual practice to keep these notes. Lastly, Plaintiff will agree to execute a medical authorization to retrieve records as it pertains only to his treatment of his hypertension. Plaintiff objects to any other disclosures pertaining to his health records as they are not relative to any of his claims.

-Seth

Seth Andrews
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From: Paul A. Woodard [<mailto:paw@connorsllp.com>]
Sent: Thursday, October 06, 2016 2:14 PM
To: Seth Andrews
Cc: Gretchen Berger
Subject: Wagner v. Chiari & Ilecki

Seth,

Further to our discussion yesterday, we request production of the following documents mentioned during plaintiff's deposition:

- (1) The two notices from the United States Postal Service regarding the attempted delivery of certified mail addressed to William J. Wagner, Jr., at 5419 Roberts Road, Hamburg, New York 14075, in or around February and March 2015;
- (2) The notes that plaintiff maintains regarding his blood pressure and/or other medical conditions, from 2010 to present; and
- (3) A signed copy of the attached authorization allowing our office to obtain a copy of plaintiff's medical records from Buffalo Medical Group.

Thank you for your courtesies. If you want to discuss any of these items, please feel free to give me a call.

Best regards,

Paul

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